

September 19, 2025

U.S. Forest Service
Brad Kinder
National Forest System
Ecosystem Management Coordination
201 14th Street SW
Washington, DC 20250

Submitted electronically via: <https://www.regulations.gov>

RE: U.S. Department of Agriculture Intent to Rescind the 2001 Roadless Area Conservation Rule—Docket No. FS-2025-0001

Dear Acting Director Kinder:

The Association of California Water Agencies (ACWA) respectfully submits comments regarding the U.S. Department of Agriculture's (USDA) intent to rescind the 2001 Roadless Area Conservation Rule.¹ ACWA appreciates USDA efforts that support active forest management strategies to help reduce wildfire risk, restore forest health, and protect watersheds and critical water infrastructure.

ACWA is the largest statewide coalition of public water agencies in the United States. ACWA represents approximately 470 member agencies that are responsible for delivering about 90 percent of the water to communities, farms, and businesses in California. ACWA represents water management entities in every sector of water supply, including municipal and agricultural water, water recycling, water reuse, wastewater management, and stormwater management. ACWA and its members are dedicated to providing a high-quality, reliable water supply in an environmentally sustainable and fiscally responsible manner.

Effective management of Inventoried Roadless Areas can decrease damage to roads, forests, water sources, wildlife habitat, and recreation sites. ACWA therefore urges USFS to consider the following as it proposed to rescind the Roadless Rule and develop an Environmental Impact Statement.

I. Increase Management on Forest Service Lands to Enhance Wildfire Prevention and Response Capacity

As a subdivision of USDA, U.S. Forest Service (USFS) operations are important to ACWA members and millions of California water users. California encompasses the second largest

¹ U.S. Department of Agriculture: *Forest Service Special Areas; Roadless Area Conservation; National Forest System Lands*. 90 Fed. Reg. 42180. August 29, 2025. <https://www.govinfo.gov/content/pkg/FR-2025-08-29/pdf/2025-16581.pdf>.

allotment of USFS land in the nation with over 20.8 million acres of land.² These 20.8 million acres make up about 20 percent of the total land mass in California and are the source of approximately half of its surface water. Of California's nearly 21 million national forest lands, 4,416,000 acres are Inventoried Roadless Areas.³

Many of California's municipal and agricultural water supplies originate in National Forest lands, particularly in the Sierra Nevada and Cascade Ranges. These source watersheds are increasingly vulnerable to severe wildfire, pest outbreaks, and post fire erosion. Additionally, the challenges posed by catastrophic wildfires, deteriorating forest conditions, and restricted land management have become increasingly urgent in recent years. Catastrophic wildfires over the past decade—including the 2017 Tubbs Fire, 2018 Camp Fire, 2020 North Complex, and 2025 Palisades Fire and Eaton Fire⁴—have underscored the urgent need for increased access and forest treatment capacity in California's upland watersheds. In 2025 to date, there are more than 47,000 wildfire incidents that have burned more than 4 million acres.⁵

Roadless areas are already largely overgrown. To help reduce wildfire risk, restore forest health, and protect water infrastructure, long-term sustainability of critical headwater areas—many of which fall within lands governed by the Roadless Rule—depends on the ability of land managers to access and perform fuels reduction activities. Proper access to care for roadless areas can spur decreased risks. For example, during the August 2021 Caldor Fire that began in Eldorado National Forest, USFS reported that proactive fuels reduction treatment efforts, such as forest thinning and prescribed burns, helped protect some communities from wildfire devastation in South Lake Tahoe⁶; flame lengths in untreated areas were observed between 100 to 150 feet while areas with fuels treatments had flame lengths reduced to 20 feet or less.⁷ Access to roadless areas to properly manage national forest lands are also needed to perform other fuels reduction activities like mechanical thinning that help prevent and mitigate catastrophic wildfires.

ACWA values the natural environment but believes its preservation depends on better management of our land and water resources. The Roadless Rule has constrained the ability of federal land managers and local partners to implement active forest management strategies in critical headwater regions. These constraints limit opportunities for strategic road access and fuel reduction projects that are essential for sustaining healthy forests and protecting water quality and supply. While the Roadless Rule was intended to preserve wilderness character, it has become increasingly clear that restricted access hinders proactive fire mitigation and rapid response capabilities. Rescinding the rule would allow fire agencies, utilities, and local water providers to better plan and implement landscape-scale treatments and protect water supply infrastructure from

² United States Forest Service: *Land Areas of the National Forest System*. September 30, 2022. https://www.fs.usda.gov/land/staff/lar/LAR2022/FY2022_LAR_book.pdf.

³ U.S. Department of Agriculture and U.S. Forest Service: *Roadless Areas Inventoried by State*. <https://www.fs.usda.gov/managing-land/planning/roadless/state-maps>.

⁴ California Department of Forestry and Fire Protection: *Top 20 Deadliest California Wildfires*. July 25, 2025. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top20_deadliest_072525.pdf?rev=2c10213901a3414bb59d68dd776f2277&hash=9762D0A17EEB2550C799638FA0CC9862.

⁵ National Interagency Fire Center: *Statistics*. September 4, 2025. <https://www.nifc.gov/fire-information/statistics>.

⁶ United States Forest Service: *Caldor Fire: Defending Lake Tahoe Basin*. October 28, 2021. <https://www.fs.usda.gov/about-agency/features/caldor-fire-defending-lake-tahoe-basin>.

⁷ United States Forest Service: *Fuels Treatment Success—Caldor Fire Area*. <https://www.fs.usda.gov/sites/default/files/CaldorMap.png>.

wildfire-related damage. ACWA therefore realizes USDA’s intent to rescind the Roadless rule to remove prohibitions on road construction, reconstruction, and timber harvesting on the nearly 59 million acres—or 30%—of national forest lands that make up Inventoried Roadless Areas.

II. Collaborate with Local Partnerships to Ensure Forest Stewardship

California water providers, communities, farms, businesses, and ecosystems rely on a strong partnership with USFS. ACWA is concerned that USFS “does not anticipate designating any Federal, State, Tribal, or local agencies as cooperating or participating agencies” and “only encourages input through public comment opportunities.” Numerous ACWA members have partnered with USFS to conduct forest health treatments on USFS lands.⁸ ACWA members have dedicated significant financial resources, time and personnel to protecting watersheds and improving forest health on federal lands. ACWA is grateful for these partnerships and encourages USFS to coordinate with all impacted parties, especially water managers, to ensure the health of national forest lands—both in California and nationwide.

Additionally, understanding local conditions is extremely important to determine when, where, and what type of forest health treatments are needed—especially among the various landscapes with California alone. Local officials best understand the needs of the community. ACWA realizes that efforts by USDA to remove prohibitions for road construction and reconstruction in roadless areas would provide discretion to local land managers to tailor management, as appropriate, to local land conditions. This provides opportunities for USFS to work with ACWA member agencies and others to implement forest stewardship strategies. ACWA urges USFS to reconsider its coordination with essential players that safeguard national forest lands.

Partners and public engagement are essential to shape and improve practical forest management strategies. ACWA encourages USFS to initiate proactive, enhanced outreach to land managers and water utilities, as well as local, state, and tribal leaders as it drafts the proposed Roadless Rule and develops an Environmental Impact Statement. These are significant policy developments that necessitate a collaborative process. As water utilities like ACWA member agencies are and will be impacted by USFS regulations, their engagement in forest-related efforts is essential.

III. Establish a Western Hub Office in California

California is currently home to numerous USDA regional operations, including the U.S. Forest Service regional office in Vallejo, California. ACWA is concerned that USDA’s proposed transition of hub locations outside California outlined in its reorganization plan⁹ could inadvertently make the development and execution of contracts and permits more difficult and create unnecessary challenges for water managers and agricultural producers. ACWA urges USDA to ensure any reorganization preserves and enhances commitments to the evolving needs of agricultural producers, rural communities, and water managers, and is responsive to the growing threats posed by poor forest health on federal lands.

⁸ Association of California Water Agencies: ACWA Member Efforts—*Protecting Water at its Source*. February 25, 2025. <https://www.acwa.com/our-work/protecting-water-at-its-source/acwa-member-efforts>.

⁹ U.S. Department of Agriculture: *Department of Agriculture Reorganization Plan*. Secretary Memorandum SM 1078-015. July 24, 2025. <https://www.usda.gov/sites/default/files/documents/sm-1078-015.pdf>.

The greatest successes have occurred when ACWA members have been able to establish trusting relationships with national forest supervisors and their superiors at the region level. ACWA is concerned that moving a USFS regional office outside of California will hinder forest health work on federal lands and place critical watersheds, and the communities and farms that depend on this water, at risk.

If USDA moves forward with the reorganization ACWA requests that USDA establish a western hub office in California. ACWA believes establishing a western hub in California is aligned with the underlying goals of Secretary Memorandum 1078-015. Section 4, Principle 2 discusses the importance of bringing USDA closer to its customers. USDA has a significant customer base in California. Also, as mentioned above, there is more USFS land in California than in any other state in the Continental United States.

IV. Maintain a Capable Workforce

ACWA recognizes the importance of efficient federal operations through a capable USDA workforce, and supports efforts to improve administrative efficiency, reduce duplication, and strengthen field-level responses. However, ACWA is concerned that USDA's reorganization of personnel could hinder engagement with local water agencies, support for multi-benefit watershed projects, forest health treatments, and administration of critical financial and technical assistance for water managers and agricultural providers. The shift of experienced USDA staff could diminish knowledge of regional and local conditions, technical expertise, knowledge of ongoing projects, historical precedents, and interagency coordination. ACWA is concerned that this may lead to inefficiencies and create challenges for water providers and others in the regulated community. For example, decreased forest work efforts may lead to higher chances of catastrophic wildfires that can have a severe economic impact on those who live in these areas as well as nationally.

V. Extend the Comment Period Deadline

ACWA appreciates USDA providing an opportunity to comment on its intent to rescind the 2001 Roadless Area Conservation Rule. Due to the technical nature of this notice and its large-scale implications on forest management and water resources nationwide, ACWA encourages USDA to extend this comment period by at least an additional 30 days. Extending the comment period will allow USDA to consider adequate responses from more impacted parties.

The current 21-day timeframe is challenging for many small water utilities—including some ACWA member agencies—who may lack the resources to develop sufficient comments within the imposed deadline. Nevertheless, those directly affected by USFS activities under USDA jurisdiction have important real-world information to share that this short timeframe will likely hinder.

Conclusion

Thank you for considering ACWA's comments. ACWA stands ready to work with USDA and USFS leadership to support active forest management strategies to help reduce wildfire risk,

restore forest health, and protect water infrastructure. Please let us know if we can provide additional information and resources. If you have any questions or would like to follow up on this matter, please contact ACWA Federal Relations Representative, Caleb Raspler, at calebr@acwa.com or (202) 434 - 4762.

Respectfully,

A handwritten signature in black ink, appearing to read "Caleb Raspler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Caleb Raspler
Federal Relations Representative
Association of California Water Agencies